

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re: ) Case No. 24-30010  
 ) (Chapter 11)  
RED RIVER SUBS, INC. )  
 )  
Debtor. )  
\_\_\_\_\_  
)

**NOTICE OF MOTION TO (I) PAY RETAINER AND MONTHLY  
SUPPLEMENTS TO SUBCHAPTER V TRUSTEE; AND (II) TO  
APPROVE AGREEMENT WITH SUBCHAPTER V TRUSTEE**

NOTICE IS HEREBY GIVEN that Red River Subs, Inc. (“Red River Subs” or the “Debtor”) has filed a motion to (i) have its proposed counsel transfer a \$5,000.00 retainer, from the funds he is holding to the Subchapter V trustee herein (the “Trustee”); (ii) pay the Trustee an additional \$1,000.00 per month (to be held in trust, alongside the retainer, pending approval of any fee applications); and (iii) enter into an agreement with the Trustee whereby he will accept payment of an excess monies owed, under a plan of reorganization, 45 days after the effective date of such plan. A copy of the motion was served via CM/ECF on January 15, 2024 (DE #8).

NOTICE IS FURTHER GIVEN that written objections to the motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court for the District of North Dakota, 655 1st Ave. N. Suite 210, Fargo, ND 58102-4932 within fourteen (14) days from the date of the service of this notice. Any objections not filed and served may be deemed waived.

*[Signature on Following Page]*

Respectfully Submitted,

Dated: January 16, 2024

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
The Dakota Bankruptcy Firm  
1630 1st Avenue N  
Suite B PMB 24  
Fargo, North Dakota 58102-4246  
Phone: (701) 394-3215  
mac@dakotabankruptcy.com  
*Proposed Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of January, 2024, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig